

RACHAEL SWERNOFSKY
Nevada Bar No. 15465
QUILLING SELANDER LOWNDS
WINSLETT & MOSER, P.C.
6900 N. Dallas Parkway, Suite 800
Plano, TX 75024
(214) 560-5443
(214) 871-2111 Fax
rswernofsky@qslwm.com
Counsel for Trans Union LLC

****Designated Attorney for Personal Service****

Kurt Bonds, Esq.
Nevada Bar No. 6228
6605 Grand Montecito Parkway, Suite 200
Las Vegas, NV 89149

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

ALICIA M. GENNA,

Plaintiff,

V.

EQUIFAX INFORMATION SERVICES,
LLC, TRANS UNION, LLC, GENESIS
CREDIT MANAGEMENT, LLC, CAPITAL
ONE BANK, KOHLS INC, and TD BANK
USA.

Defendants.

Case No. 2:22-cv-01429-GMN-EJY

**JOINT STIPULATION AND ORDER
EXTENDING DISCOVERY DEADLINES**

(FIRST REQUEST)

Plaintiff Alicia M. Genna (“Plaintiff”), and Defendants Trans Union LLC (“Trans Union”), Equifax Information Services, LLC (“Equifax”) and TD Bank USA, N.A. (misnamed as “TD Bank USA”) (“TD”) (“the Parties”) hereby jointly move to extend all deadlines set forth in the Stipulated Discovery Plan and Scheduling Order filed with this Court on November 10, 2022, (ECF No. 27) by a period of sixty (60) days.

1. On September 2, 2022, Plaintiff filed her Complaint (ECF No. 1), against Defendants Trans Union, Equifax and TD.

1 2. Trans Union filed its Answer to Plaintiff's Complaint on September 27, 2022
2 (ECF No. 10). TD filed its Answer to Plaintiff's Complaint on October 7, 2022 (ECF No. 12).

3 3. On October 7, 2022, Plaintiff filed her Amended Complaint (ECF No. 13), against
4 Defendants Trans Union, Equifax and TD.

5 4. Trans Union filed its Answer to Plaintiff's Amended Complaint on October 10,
6 2022 (ECF No. 14). Equifax filed its Answer to Plaintiff's Amended Complaint on October 26,
7 2022 (ECF No. 18). TD filed its Answer to Plaintiff's Amended Complaint on November 2,
8 2022 (ECF No. 22).

9 5. The parties have completed the following discovery to date: The parties have
10 exchanged initial disclosures, Plaintiff has served her first set of document production, Plaintiff
11 served written discovery requests to all Defendants on December 12, 2022 and December 30,
12 2022, Trans Union served written discovery requests to Plaintiff on January 31, 2023, and
13 Equifax has settled with Plaintiff and is currently finalizing settlement terms and agreements.

14 6. The parties still need to conduct depositions, potentially additional written
15 discovery, serve subpoenas, conduct third-party depositions, and conduct expert discovery.

16 7. The Parties require more time and accompanying deadlines from the Court to
17 adequately conduct discovery due to scheduling conflicts. The parties are also discussing
18 settlement.

19 8. Good cause exists for the requested extension, namely, this action involves three
20 remaining defendants, each with their own separate claims and affirmative defenses. Given that
21 plaintiff will propound and respond to discovery with each defendant, potentially conduct
22 depositions for each defendants' witnesses located across the country, may retain at least one
23 expert, and must coordinate with counsel for each defendant, the Parties cannot fully investigate
24 and litigate this action within the standard discovery period .

25 9. The additional time will allow the Parties to conduct additional fact discovery,
26 including taking depositions, potentially additional written discovery, acquiring all documents
27 from third-parties, resolving any discovery issues, and additional time to adequately determine
28 whether expert discovery will be needed in this matter. The Parties have also engaged in

settlement discussions and the additional time will assist in continuing those discussions and explore a mediation or settlement conference

10. No party will be prejudiced by this Court granting this Stipulation as all parties jointly seek an extension of these deadlines. Moreover, the Parties believe that allowing the extension will serve the ends of judicial economy.

11. Moreover, the requested extensions are not sought for the purposes of delay.

12. This is the Parties' first request to extend these deadlines.

13. Accordingly, the parties request adoption of the following deadlines:

a. Discovery Plan:

Discovery Cut-off **05/26/2023**

Deadline to Disclose Rebuttal Expert Disclosures **04/28/2023**

Deadline to File Dispositive Motions **06/26/2023**

b. **Pre-Trial Order:** The parties shall file a joint pretrial order no later than

07/26/2023 or thirty (30) days after the date set for filing dispositive motions. In the event that parties file dispositive motions, the date for filing the joint pretrial order shall be suspended until thirty (30) days after decision on the dispositive motion or further order of the Court.

WHEREFORE, Plaintiff and Trans Union, Equifax and TD respectfully request this Honorable Court (1) extend discovery in the present matter as set forth above; and (2) reissue a new Scheduling Order to reflect the requested extension.

1 DATED: January 31, 2023

2 **QUILLING, SELANDER, LOWNDS,
WINSLETT & MOSER, P.C.**

3 */s/ Rachael Swernofsky*

4 **RACHAEL SWERNOFSKY**

5 Nevada Bar No. 15465
6 6900 N. Dallas Parkway, Suite 800
Plano, TX 75024
(214) 871-2100
(214) 871-2111 Fax
rswernofsky@qslwm.com

7 **Counsel for Trans Union LLC**

8 **CLARK HILL**

9 */s/ Gia Marina*

10 **GIA MARINA**

11 Nevada Bar No. 15276
12 3800 Howard Hughes Parkway, Suite 500
13 Las Vegas, NV 89169
(702) 862-8300
(701) 778-9709 Fax
gmarina@clarkhill.com

14 **Counsel for Equifax Information Services
15 LLC**

16 IT IS SO ORDERED.

17 
18 **LAYNARD L. ZOUCHAH**

19 **UNITED STATES MAGISTRATE JUDGE**

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24 Dated this 31st day of January, 2023.
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1 **LAW OFFICES OF MILES N. CLARK, LLC**

2 */s/ Miles N. Clark*

3 **MILES N. CLARK**

4 Nevada Bar No. 13848
5 5510 S. Fort Apache Road, Suite 30
Las Vegas, NV 89148-7700
(702) 856-7430
(702) 447-8048 Fax
miles@milesclarklaw.com

6 **Counsel for Plaintiff**

7 **BARNES & THORNBURG LLP**

8 */s/ Brian Melendez*

9 **BRIAN MELENDEZ**

10 License No. 0223633 (Minn.) (admitted pro
11 hac vice)
12 Suite 2800
13 225 South Sixth Street
14 Minneapolis, MN 55402-4662
15 Ph. 612.367.8734
16 Fax 612.333.6798
17 brian.melendez@btlaw.com

18 in association with

19 Loren S. Young
20 LINCOLN, GUSTAFSON & CERCOS LLP
21 Nev. Bar No. 7567
22 Suite 200
23 3960 Howard Hughes Parkway
Las Vegas, NV 89169
Ph. 702.257.1997
Fax 702.257.2203
lyoung@lgclawoffice.com

24 **Counsel for TD Bank USA, N.A.
(misnamed as "TD Bank USA")**